

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced)	
E911 Emergency Calling Systems)	
)	

To: The Commission

**Carrier Report of Mid-Tex Cellular, Ltd. Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification**

Mid-Tex Cellular, Ltd. hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), in compliance with the Federal Communications Commission's ("FCC" or "Commission") Further Memorandum Opinion and Order in the above-captioned proceeding.

I. Background / Contact Information

Mid-Tex serves rural Texas and its contact information is as follows:

Ray Hooker
Manager

Mid-Tex Cellular, Ltd. (TRS # 808287)
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II. E911 Phase II Location Technology Information

Mid-Tex has yet to choose a solution for its Phase II ALI technology. Mid-Tex remains undecided at this point due to its concern about general handset availability in time to meet the FCC's rules and the lack of pricing information for network-based solutions. As a result, Mid-Tex has so far been unable to adequately compare the various Phase II solutions in order to commit to a selection. Mid-Tex is searching for a product that is available and is proven to work within the time frame necessary for Mid-Tex to

achieve Phase II implementation in compliance with the Commission's rules.¹ Whichever technology Mid-Tex selects, it intends to deploy it throughout its service area.

III. Testing and Verification

Mid-Tex has yet to test any ALI solutions since it is still examining available products. In addition, Mid-Tex has not been able to test any handsets since none are available and Mid-Tex has yet to be given a date when ALI-capable handsets will be available. Mid-Tex anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

IV. Implementation Details and Schedule

While Mid-Tex is awaiting product availability from handset vendors, it has developed a tentative implementation schedule to meet the FCC's handset-based rules and, if necessary, network-based rules. Mid-Tex will make its technology choice by the first quarter of 2001. If Mid-Tex chooses a handset solution, it will begin selling ALI-capable handsets on October 1, 2001 as the FCC's rules require. Mid-Tex will continue to evaluate network-based ALI solutions and, if it chooses a network solution, intends to select and deploy a technology after the first quarter of 2001, once it has made its choice. Mid-Tex will accelerate this schedule to the extent necessary upon receipt of a PSAP request.

V. PSAP Interface

Mid-Tex has yet to receive a Phase II PSAP request.² Most of the PSAP interface details will depend upon the technology Mid-Tex chooses and the specific requests of the PSAP.

VI. Handset Information

If Mid-Tex decides to pursue a handset-based solution, it will run promotions in order to replace existing handsets. The price of the new ALI-capable handsets, unavailable at this time, will affect Mid-Tex's replacement strategy.

¹ Mid-Tex has been researching many different Phase II vendors and their potential product offerings. These companies include Nortel, Snap Track, SCC Communications, Technocom Corporation, GTE Telecommunications Services, Cell-Loc, True Position, US Wireless, and SigmaOne Communications Corporation.

² In general, the following hardware and software is needed to transmit Phase II data to PSAPs: IS41C – Dialed Number Trigger, E911 Software, MPC – Mobile Positioning Center, PDE – Position Determining Entity, and receivers at each cell site.

VII. Other Information

Mid-Tex notes that the remote and rural nature of its service territory in Texas can present additional and unforeseen problems when installing and testing location technology. Mid-Tex would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, Mid-Tex's Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

November 9, 2000